

AFFIDAVIT

I, Herman L. Arnold, having been duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the United States Department of State, Diplomatic Security Service ("DSS"), and have been so employed since August, 2002. As part of my official duties, I am assigned to investigate violations of matters relating to the U.S. Department of State, including passport and visa fraud, illegal, improper use and possession of identification documents and false statements made to illegally obtain passports and visas.

2. The information set forth in this affidavit is based upon my investigation as well as information provided by the Boston Passport Agency, and other public agencies. In submitting this affidavit, however, I have not included each and every fact known to me about the investigation, but only those facts that I believe are sufficient to establish probable cause to believe that an individual named Lance Steven Tirso ROXAS conspired with another to willfully and knowingly make a false statement in an application for a passport with the intent to induce or secure the issuance of a U.S. passport, in violation of Title 18, United States Code, Section 371 and Title 18, United States Code, Section 1542.

3. On March 4, 2002, a person using the identity of Lance Steven Tirso ROXAS submitted an application ("DS-11") for a

United States passport at the U.S. Post Office located in Cambridge, MA. A copy of the passport application is appended hereto as Exhibit A. In support of the application, the person submitted a birth certificate in the name of Lance Steven Tirso Roxas from the Board of Health and Vital Statistics of Hudson County, Jersey City, New Jersey, reflecting that the person was born on May 9, 1971, in Jersey City, New Jersey. A copy of the birth certificate is appended hereto as Exhibit B. The person signed the application in the presence of an authorized passport acceptance clerk, attesting that all of the information contained therein was true. Also, as required, the applicant submitted two photographs of himself and one was attached to the passport application at the time of its submission.

4. On January 14, 2004, Diplomatic Security Service Special Agent William T. Noone of the New York Field Office of the Diplomatic Security Service interviewed the person who submitted the application. He admitted that his true name is Renald Jean-Baptiste, and that he falsely claimed to be Lance Steven Tirso Roxas in submitting the March 4, 2002 passport application. Jean-Baptiste stated that he acquired the identity documents for the passport application from the true Lance Steven Tirso Roxas. A copy of Jean-Baptiste's sworn statement is appended hereto as Exhibit C.

5. On January 14, 2004, the true Lance Steven Tirso ROXAS

was interviewed by Diplomatic Security Service Special Agent William T. Noone of the New York Field Office of the Diplomatic Security Service. ROXAS admitted that he supplied Renald Jean-Baptiste with identification documents for the purpose of aiding him in obtaining employment and a U.S. Passport, knowing that Jean-Baptiste was not entitled to a U.S. Passport. A copy of Lance Steven Tirso Roxas's sworn statement is appended hereto as Exhibit D.

6. Based on the foregoing, I have probable cause to believe that Lance Steven Tirso ROXAS, did conspire to willfully and knowingly make a false statement in an application for a passport with the intent to induce or secure the issuance of a U.S. passport, for the use of another, in violation of Title 18, United States Code, Sections 371 and 1542.

I certify that the foregoing is true and correct. Executed at Boston, Massachusetts, this 19th day of February, 2004.



HERMAN L. ARNOLD
Special Agent
U.S. Department of State,
Diplomatic Security Service

Subscribed and sworn before me this 19th day of February, 2004, in Boston, Massachusetts.

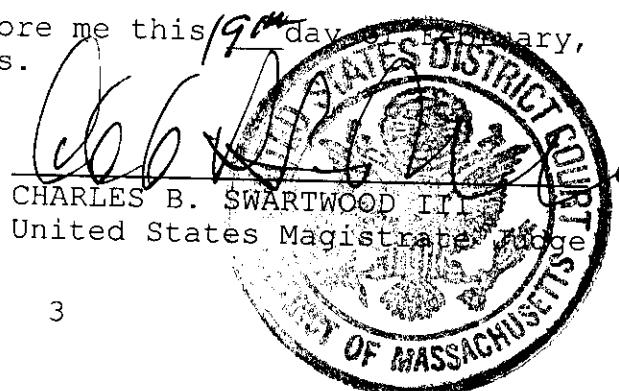


EXHIBIT A



U. S. Department of State

APPLICATION FOR U.S. PASSPORT REGISTRATION
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle)

LANCE STEVEN TIRSO

LAST

BOX AS

2. MAIL PASSPORT TO: STREET / RFD # OR P.O. BOX

114436

APT. # 2C

CITY NEW YORK

STATE NY

ZIP CODE 10018

COUNTRY / IN CARE OF (if applicable)

5. DATE OF BIRTH

Month

Day

Year

6. SOCIAL SECURITY NUMBER

SEE FEDERAL TAX LAW NOTICE ON PAGE 4

7. HEIGHT

8. HAIR COLOR

9. EYE COLOR

10. HOME TELEPHONE

11. BUSINESS TELEPHONE

12. OCCUPATION

13. PERMANENT ADDRESS (DO NOT LIST P.O. BOX)

STREET/R.F.D. #

CITY Boston

STATE MA

ZIP CODE 02115

14. FATHER'S FULL NAME

BIRTHPLACE

BIRTHDATE

U.S. CITIZEN

Yes

Last

No

15. MOTHER'S FULL MAIDEN NAME

BIRTHPLACE

BIRTHDATE

U.S. CITIZEN

Yes

Last

No

16. HAVE YOU EVER

SPOUSE'S OR FORMER SPOUSE'S FULL NAME AT BIRTH

BIRTHPLACE

BIRTHDATE

U.S. CITIZEN

Yes

Last

No

17. OTHER NAMES YOU HAVE USED

(1)

(2)

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT?

 Yes No

IF YES, COMPLETE NEXT LINE AND SUBMIT PASSPORT IF AVAILABLE.

DISPOSITION

APPROXIMATE ISSUE DATE

MOST RECENT PASSPORT NUMBER

Month Day Year

 Submitted Stolen Lost Other

It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport cannot be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DS-64.

19. EMERGENCY CONTACT. If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.

NAME

STREET

CITY

STATE

ZIP CODE

TELEPHONE

20. TRAVEL PLANS (not mandatory)

Month Day Year

Date of Trip

Length of Trip

COUNTRIES TO BE VISITED:

21. STOP. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH.

I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions"

on the reverse of this application form (unless explanatory statement is attached). I solemnly swear (or affirm)

that the statements made on this application are true and the photograph attached is a true likeness of me.

X Father's/Legal Guardian's Signature (if identifying minor)

X Mother's/Legal Guardian's Signature (if identifying minor)

22. FOR ACCEPTANCE AGENT'S USE

Subscribed and sworn to before me

Francis E. Noonan

Month Day Year

(SEAL)

 Clerk of Court; Location PASSPORT Agent Postal Employee (Vice) Consul USA

Cambodia 002/39

(Signature of person authorized to accept application)

23a. Applicant's or Father's Identifying Documents

 Driver's License Passport Other (Specify) MASS LIQUOR LTD

Issue Date: 02/25/2002 Expiration Date: 02/25/2007 Place of Issue: MASS

LANCE STEVEN ROTOS ID No. S42776106

Name ID No.

23b. Mother's Identifying Documents

 Driver's License Passport Other (Specify)

Issue Date: Expiration Date: Place of Issue:

Name ID No.

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)

 Birth Certificate SR CR City Filed/Issued: 5/1971

Report of Birth:

Naturalization/Citizenship Cert. No:

Other:

Seen & Returned:

Attached:

INA TIR: Boston 11/12/04

D174047; W-2300, APPLICATION APPROVAL

1261

103869534

End. # Exp.

EXHIBIT B

BIRTH REGISTRATION CERTIFICATE

Board of Health and Vital Statistics

OF HUDSON COUNTY
JERSEY CITY, NEW JERSEY



NAME

S

PLACE OF BIRTH

DATE OF BIRTH

JERSEY CITY, N. J.

24-1-71

This is a true certification of name and birth facts as recorded in this office.

MAY 13th, 1971

REGISTRATION DATE

MAY 14th, 1971

DATE ISSUED

Maurice Summer

MURICE SUMMER
REGISTRAR OF VITAL STATISTICS

STATE OF NEW JERSEY

B.H. 2732 PROGRESS PRINTING CO.

EXHIBIT C

United States Department of State
Bureau of Diplomatic Security



SWORN STATEMENT

PLACE: SKYLIGHT DINER
34TH STREET & 9TH AVE MANHATTAN, NY
DATE: 11/14/2004

I, Renold Jean-Baptiste, hereby make the following statement
voluntarily to SAC WILLIAM NOONE who has been identified to me as a
Special Agent of the Diplomatic Security Service, United States Department of State.

Renold Jean-Baptiste Lance Kates

I ~~had~~ thought I could have set aside
of using Lance's IDs so that
I could get out of the country to be able
to do a job abroad.
No I did not pay for the documents
Lance let me used them because he
was a good friend to me.
No I do not have the documents
sent them by fall of 2002 to the
passport agency. I don't know where they
are right now because I don't have them.
I got all the documents from Lance.
I applied in Boston.

It was the only time I have ever done
such a thing. I was just trying to do
a job. I have never had any problem
with the law, never been arrested.

Renold Jean-Baptiste

414 W 36th St 19c Ny Ny 10018
212-595 8704

6-9-73 Birth date

I came to the U.S.A in May 89

032-76-2858

X Renold Jean-Baptiste

United States Department of State
Bureau of Diplomatic Security

I SWEAR THAT THE CONTENTS OF THIS STATEMENT OF RENALD JEAN BAPTISTE
PAGES ARE TRUE AND CORRECT: THAT I HAVE MADE THIS STATEMENT OF MY OWN FREE WILL
AND ACCORD WITH NO PROMISES OF IMMUNITY HAVING BEEN MADE TO ME AND WITHOUT ANY
THREATS, FORCE, OR COERCION BEING USED AGAINST ME. I MAKE THIS STATEMENT IN AN
EFFORT TO ASSIST THE UNITED STATES DEPARTMENT OF STATE IN AN OFFICIAL
INVESTIGATION. I HAVE BEEN COURTEOUSLY TREATED AND I HAVE NO OBJECTION TO THE
CONDUCT OF THE INTERVIEWING OFFICERS.

FURTHER DEPONENT SAITH NOT.

S: Renald Jean Baptiste

SUBSCRIBED AND SWORN BEFORE ME ON THIS 14 DAY OF JAN, 2004

S: William T. Lane

SPECIAL AGENT
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

WITNESS: S: Michael S. Worsley, Jr.

Special Agent
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

EXHIBIT D

United States Department of State
Bureau of Diplomatic SecuritySWORN STATEMENTPLACE: CRUNCH FITNESS 37.7th ST 3/W 7th BWAYDATE: 14 JAN 2004

I LUCIE PROKAS, hereby make the following statement
voluntarily to SA William Noone who has been identified to me as a
Special Agent of the Diplomatic Security Service, United States Department of State.

THAT DURING THE YEAR OF 2002 I
MY DOCUMENTATION WAS SENT DIRECTLY
TO 444 36TH ST. NV NY. I FELT
UNSAFE TO GO TO THE CONSULATE AS IT
WAS LEFT ALONE BY HIS FAMILY AFTER
HE LEFT FOR THIS COUNTRY ILLEGALLY.
HE GOT ORGANIZED THE DOB OF HIS
PARENTS WITH THE CENSUS RECORDS.
I GAVE HIM MY DOCUMENTATION SO HE COULD
GET DOCUMENTATION WITH HIS PARENTS
IN IT THAT WOULD ENABLE HIM TO
TAKE THE DOB HE THEM FOUND.
NOT THAT HE NEEDED TO FLY OVERSEAS
TO DO THIS REQUESTED AND I COULD
ALREADY SENT HIM DOCUMENTATION SO
HE COULD GET A PASSPORT.
I FELT VERY SORRY FOR ME,
I FEEL DUE TO THE CIRCUMSTANCES
HE HAS HAD TO FACE IN HIS
AND THAT TO WHAT LED ME TO
GIVE HIM MY DOCUMENTATION.

United States Department of State
Bureau of Diplomatic Security

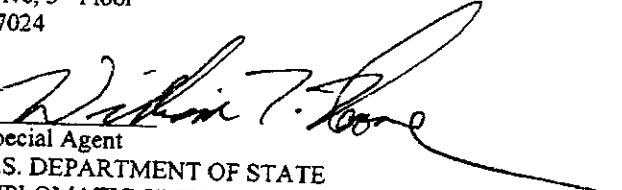
I SWEAR THAT THE CONTENTS OF THIS STATEMENT OF LANCE RAMS ()
PAGES ARE TRUE AND CORRECT: THAT I HAVE MADE THIS STATEMENT OF MY OWN FREE WILL
AND ACCORD WITH NO PROMISES OF IMMUNITY HAVING BEEN MADE TO ME AND WITHOUT ANY
THREATS, FORCE, OR COERCION BEING USED AGAINST ME. I MAKE THIS STATEMENT IN AN
EFFORT TO ASSIST THE UNITED STATES DEPARTMENT OF STATE IN AN OFFICIAL
INVESTIGATION. I HAVE BEEN COURTEOUSLY TREATED AND I HAVE NO OBJECTION TO THE
CONDUCT OF THE INTERVIEWING OFFICERS.

FURTHER DEPONENT SAITH NOT.

S: 

SUBSCRIBED AND SWORN BEFORE ME ON THIS 14 DAY OF Jan, 2004

S: 
SPECIAL AGENT
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

WITNESS: S: 

Special Agent
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024